

HONORABLE JAMAL N. WHITEHEAD

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JEFFREY WEBB and DONNA WEBB,
Husband and Wife,

Plaintiffs,

v.

TRAVELERS HOME AND MARINE
INSURANCE COMPANY, a Foreign
Corporation doing business in Washington,
DOES I-V,

Defendant.

No.: 2:24-cv-00431-JNW

STIPULATED MOTION TO EXTEND
CERTAIN DEADLINES

NOTE ON MOTION CALENDAR:
Wednesday, March 12, 2025

I. INTRODUCTION AND RELIEF REQUESTED

Pursuant to LCR 10(g), LCR 16(b)(6), and Fed. R. Civ. P. 16(b)(4), Plaintiffs Jeffery Webb and Donna Webb (“Plaintiffs”) and Defendant Travelers Home and Marine Insurance Company (“Defendant” or “Travelers”) (collectively, the “Parties”) jointly move the Court for an order extending certain deadlines.

II. STATEMENT OF FACTS

The Parties incorporate the Statement of Facts outlined in Dkt. 13 herein. Trial is set for November 3, 2025. Plaintiffs secured a contractor’s estimate that Defendant is reviewing. In addition, the Parties are scheduling mediation for the end of May. Between the filing of

1 this stipulation and the mediation, the Parties will have also conducted an inspection of the
2 property with Defendant's expert contractor. The Parties continue to believe that early
3 settlement is possible and wish to mediate the case before incurring additional and
4 unnecessary litigation costs. As such, the Parties wish to extend the following deadlines:
5 (1) Disclosure of Expert Testimony; (2) Disclosure of Rebuttal Expert Testimony;
6 (3) Discovery Motions; and (4) Completion of Discovery.

7 **III. AUTHORITY**

8 Good cause exists to continue the case deadlines pursuant to Fed. R. Civ. P. 16(b)(4)
9 and LCR 16(b)(6) because the Parties wish to minimize the use of judicial resources by
10 mediating this case prior to disclosure expert testimony.

11 A trial schedule may be modified only for good cause and with the judge's consent.
12 Fed. R. Civ. P. 16(b)(4). Good cause exists where parties seeking modification of a
13 scheduling order cannot meet the order's timetable, even with the exercise of due diligence.
14 *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992).

15 There is good cause to continue certain case deadlines to allow the parties the
16 opportunity to inspect the property, compare expert estimates, and complete mediation. The
17 Parties wish to complete these tasks while avoiding the expense of expert and rebuttal expert
18 reports at this stage. The Parties are not seeking a continuance to delay resolution of this
19 case—rather, the Parties wish to minimize litigation expenses and focus their attention on
20 resolving this case at mediation.

21 The extension of these deadlines is not intended to affect the other deadlines set in
22 Dkt. 15. The Parties respectfully propose the following extended deadlines listed in the table
23 below:

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Deadline	Current Date	Proposed Date
Disclosure of expert testimony under Fed. R. Civ. P. 26(a)(2)	April 4, 2025	June 6, 2025
Disclosure of rebuttal expert testimony under Fed. R. Civ. P. 26(a)(2)	Within 30 days after the other party's expert disclosure	Within 30 days after the other party's expert disclosure
All motions related to discovery must be filed by (see LCR 7(d))	May 5, 2025	July 2, 2025
Discovery completed by	June 3, 2025	July 11, 2025

IV. CONCLUSION

For the foregoing reasons, the Parties respectfully and jointly request that the Court find that there is good cause to extend certain case deadlines and enters an order extending certain case deadlines as proposed above, pursuant to Fed. R. Civ. P. 16(b)(4) and LCR 16(b)(6).

The Parties certify that this motion contains 509 words in compliance with the Local Civil Rules.

/s/ Robert D. Bohm, per email permission

Robert D. Bohm, WSBA #42703
ROBERT D. BOHM, PLLC
PO Box 25536
Federal Way, WA 98093
Email: rdbohm@premisesinjurylaw.com

Counsel for Plaintiffs

/s/ Jesse Froehling, per email permission

Jesse Froehling, WSBA #47881
Daniel McLafferty, WSBA #45243
BASTION LAW, PLLC
113 Cherry St., PMB 97380
Seattle, WA 98104-2205
Email: jesse@bastion.law
Email: dan@bastion.law

Counsel for Plaintiffs

/s/ Caitlyn E. Robinson

Pamela J. DeVet, WSBA #32882
Caitlyn E. Robinson, WSBA #60055
BULLIVANT HOUSER BAILEY PC
925 Fourth Ave. Suite 3800
Seattle, WA 98104

Email: pamela.devet@bullivant.com
Email: caitlyn.robinson@bullivant.com

Counsel for Defendant

PROPOSED ORDER

It is so ordered.

DATED this 13th day of March, 2025.



Jamal N. Whitehead
United States District Judge

4927-1345-3605.1

CERTIFICATE OF SERVICE

I hereby certify that on March 12, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF e-filing system which will send notification of such filing to the persons listed below that are registered:

Robert D. Bohm, WSBA # 42703
 ROBERT D. BOHM, PLLC
 PO Box 25536
 Federal Way, WA 98093
 E-mail: rdbohm@premisesinjurylaw.com

☐ via hand delivery.
☐ via first class mail.
☐ via email
☒ CM/ECF E-service

Jesse Froehling, WSBA #47881
 Daniel McLafferty, WSBA #45243
 BASTION LAW, PLLC
 113 Cherry Street, PMB 97380
 Seattle, WA 98104-2205
 E-mail: jesse@bastion.law
 E-mail: dan@bastion.law

Attorneys for Plaintiffs

Dated this 12th day of March, 2025.

/s/ Diane M. Lindberg
 Diane M. Lindberg, Legal Assistant
 E-mail: diane.lindberg@bullivant.com

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